

Form G-4

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Mark A Vallejo Maritza Vallejo Case No. 19-24735 Chapter 7

All Cases: Moving Creditor WELLS FARGO BANK, N.A. Date Case Filed 8/30/19

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report filed on _____
☒ No-Asset Report not Filed, Date of Creditor's Meeting: 11/04/2019

1. Collateral
 - a. Home ☒
 - b. Car ☐ Year, Make and Model _____
 - c. Other _____
2. Balance Owed as of 09/06/2019: \$455,003.67
Total of all other Liens against Collateral: \$0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$330,000.00, Price Opinion based on comparables.
5. Default
 - a. ☒ Total Default as of 09/06/2019
Number of months 13 Amount \$41,223.48
 - b. ☐ Post-Petition Default
 - i. ☐ On direct payments to the moving creditor
Number of months _____ Amount _____
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____
6. Other Allegations
 - a. ☐ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362(d)(1)
 - i. ☐ Bad faith (describe) _____
 - ii. ☐ Multiple filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☒ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: 9/26/2019

/s/ Joel P. Fonferko
Counsel for Movant